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17 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
18 REED, and COASTAL PROTECTION
RANGERS, INC.
19

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
22

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
individual; and COASTAL
25 PROTECTION RANGERS, INC., a
26 California non-profit public benefit
corporation,
27

28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' REQUEST FOR
JUDICIAL NOTICE IN OPPOSITION
TO INDIVIDUAL DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT OR, IN THE
ALTERNATIVE, SUMMARY
ADJUDICATION**

Case No. 2:16-cv-02129-SJO (RAOx)

PLTFS.' REQUEST FOR JUDICIAL NOTICE IN OPP. TO INDIVIDUAL DEFENDANTS'
MOTIONS FOR SUMMARY JUDGMENT OR, IN THE ALT., SUMMARY ADJUD.

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v.

LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including but
not limited to SANG LEE, BRANT
BLAKEMAN, ALAN JOHNSTON
AKA JALIAN JOHNSTON,
MICHAEL RAE PAPAYANS,
ANGELO FERRARA, FRANK
FERRARA, CHARLIE FERRARA,
and N. F.; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative
capacity; and DOES 1-10,

Defendants.

Judge: Hon. S. James Otero
Date: September 5, 2017
Time: 10:00 a.m.
Crtrm.: 10C

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection
Rangers, Inc. ("Plaintiffs") respectfully request this Court take judicial notice,
pursuant to Rule 201(b)(2) of the Federal Rules of Civil Procedure, of the following:

1. Attached as Exhibit A is a true and correct copy of a February 6, 2014
Easy Reader News article authored by Rachel Reeves, entitled "Lunada Bay
localism faces a new challenge." This article is available online through the Easy
Reader News website at: <https://www.easyreadernews.com/lunada-bay-localism-faces-new-challenge/>;
2. Attached as Exhibit B is a true and correct copy of a May 8, 1995 Los
Angeles Times article authored by Tony Perry, entitled "Turf Wars Spoil Sanctity of
Southland Surf Beaches : Violence: Popularity leads to crowding. Charges that one
group attacked outsiders highlight the problem." This article is available online
through the Los Angeles Times website at: http://articles.latimes.com/1995-05-08/news/mn-63795_1_lunada-bay;
3. Attached as Exhibit C is a true and correct copy of a May 9, 2016 LA

1 Weekly article authored by Hillel Aron, entitled "Can a Cop, a Model and Two
2 Lawyers Break a Surf Gang's 45-Year Grip on Lunada Bay?" This article is
3 available online through LA Weekly's website at:
4 [http://www.laweekly.com/news/can-a-cop-a-model-and-two-lawyers-break-a-surf-
5 gang-s-45-year-grip-on-lunada-bay-6902450](http://www.laweekly.com/news/can-a-cop-a-model-and-two-lawyers-break-a-surf-gang-s-45-year-grip-on-lunada-bay-6902450).

6 The Court may take judicial notice of Exhibits A, B, and C under Federal
7 Rule of Civil Procedure 201(b)(2) because these documents can be accurately and
8 readily determined from sources whose accuracy cannot reasonably be questioned.

9 DATED: August 7, 2017

HANSON BRIDGETT LLP

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By: /s/ Kurt A. Franklin
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